

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VIII
FIELD OPERATIONS BRANCH

RCRA INSPECTION REPORT

DATE OF INSPECTION: January 20, 1983

FACILITY: Ashland Chemical

LOCATION: 3350 S. Zuni
Sheridan, Colorado 80110

CONTACT: Thomas C. Henehan

NOTIFICATION: Generator, Transporter

TYPE OF INSPECTION: Routine

PARTICIPANTS: Thomas C. Henehan, Ashland Chemical
J. Leo Martinez, USEPA
Donna K. Imman, USEPA

WEATHER CONDITIONS: 35° F

TIME IN: 14:00 P.M.

TIME OUT: 14:30 P.M.

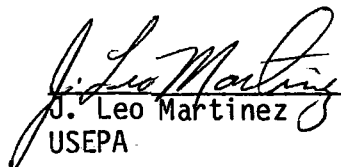
On Thursday, January 20, 1983, a routine RCRA inspection was conducted at Ashland Chemical. Credentials were presented to Mr. Henehan.

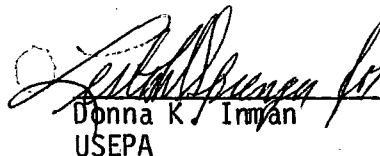
The facility is a chemical distributor. They deal mostly in solvents. Bulk shipments are received and are repacked into small drums. The waste they produce is a line flush which is stored in 500-gallon tanks and is sold as a product. Ashland would like to remain registered as a generator and a transporter in the event that they may not be able to sell their line flush solvents for beneficial reuse.

The firm is in the process of working out a contract with Chemical Waste Management and will transport and act as a waste transfer station for Chemical Waste Management. All correspondence concerning this new operation is being handled by Arlene A. Hendrickson in Columbus, Ohio.

Prepared by:

Reviewed by:


J. Leo Martinez
USEPA
Date 1/25/83


Donna K. Imman
USEPA
Date 1/25/83

U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION VIII
WASTE MANAGEMENT BRANCH
DISPOSITION FORM - RCRA INSPECTIONS

Facility: Ashland Chemical ID #: 60090010026

Inspectors: Martinez / Inman Date: 1/20/83

1. Thoroughness/Adequacy of Report and Field Notes

- No field notes attached.

What solvent is used to flush the lines? Lime
Is it listed? No If so, how long is storage of
the spent solvent? Where is it sent to?

The waste lime is recombined and sold in
another product to the consumer.

2. Procedural Aspects

3. Disposition

John Shannon
Case Preparation

1/31/83
Date

Copies to: Case File
Inspector

Section Chief

Date

Parade Packaging Materials has made two shipments of waste ink (D001). Manifest 00849 consisted of 28 drums, which were picked up by Ashland on October 20, 1983. Chemical Waste Management took possession of the load the same day. The second shipment occurred on December 6, 1983, under manifest number 00854. This shipment consisted of six drums of waste ink. Chemical Waste took possession of the drums on December 6, 1983. Manifest 000849 does not have a generator ID number, because the facility did not have a number. A representative of Parade Packaging Materials and Ashland Chemicals talked with Jon Minkoff prior to this shipment and Parade Packaging did receive an EPA ID number prior to their second shipment.

Eaton Corporation (NEP000000008) shipped seventeen drums of waste cyanide solution via NW Transport Service, Inc. (COD 000695155). This shipment, under manifest 83382839, arrived at Ashland Chemicals on November 23, 1983 and Chemical Waste Management took possession of it from Ashland Chemical on December 8, 1983. This shipment was at Ashland from November 23 until December 8, 1983, a total of fifteen days, due to the severe snowstorm which occurred at Thanksgiving and closed the highways.

Ashland acted as an intermediate in the shipment of 32 drums of waste from Union Oil/Molycorp., Inc. Mr. Baird stated, in a phone conversation January 19, 1984, Ashland made the arrangements with Molycorp, Inc. for Chemical Waste Management to pick up the waste. The drums were picked up by Chemical Waste Management, Inc., at the generating facility. Ashland neither transported nor handled the drums involved in this shipment. This waste was shipped under manifests 030004, 030005, 030006, 030007 and 030008. Manifest 030008 is missing the generator date shipped and the TSD date accepted. Since Ashland did not serve as the transporter, the discrepancy was not cited at this time.

Mr. Baird showed the inspectors a log where pertinent information is recorded about each shipment. With the exception of some manifest problems, Ashland appears to be meeting the RCRA requirements for a transfer station and transporter.

Prepared by:

EPA

Reviewed by:

EPA

Date

Date

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

360 Lincoln, Denver, CO 80295

NOTICE OF INSPECTION

- ☒ Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended
☐ Toxic Substances Control Act (TSCA) Public Law 94-469, as amended
☐ Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended

Date of Inspection 1/20/83 Inspector No. 424 Sequence 3 / HOUR 1400 IN
 FATES Reason 1435 OUT
 RCRA: GEN. ☒ / TRANSP. ☒ / TSD. ☐ / FIFRA/TSCA: Invest. Type 1435 OUT
 Facility Representative Thomas C Henahan Title

Facility Ashland Chemical (Function Code) (ID Number COT 09001 0026) Address 3350 S Zuni
Sheridan Phone () ()

Reason For Inspection Entry by Consent ☒ Warrant ☐

- ☒ To determine the extent of compliance with the above referenced law, including the collection of samples, documents, and/or photographs.
☐ Other (Specify)

Violations of above referenced law are suspected from information or complaint. ☐ yes ☒ no

Samples and/or Doc. Collected (Sequence) (Medium) Date to Lab
 (describe below)

NA

Duplicate Samples Received: () Yes (X) No / Photographs Taken: () Yes (X) No
 Date to Processing:

This inspection has revealed the following probable violations of EPA laws or regulations:

NA

The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.

Signature of Inspector (EPA/Contr./State) / Assisting Inspectors (EPA/Contr./State)

[Signature] / 1. Donna R. Juman
 Signature of Facility Representative / 2.
Billy Gabe / 3.

RESOURCE CONSERVATION AND RECOVERY ACT

Section 3007 - Inspections

(a)... "For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this title, such officers, employees or representatives are authorized -

(1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposal of, or transported from;

(2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.

Each such inspection shall be commenced and completed with reasonable promptness. If the officer, employee or representative obtains any samples, prior to leaving the premises, he shall give to the owner, operator, or agent in charge a receipt describing the sample obtained and if requested a portion of each such sample equal in volume or weight to the portion retained.

TOXIC SUBSTANCES CONTROL ACT

Section 11 - Inspections and Subpoenas

(a) ...the Administrator, and any duly designated representative of the Administrator, may inspect any establishment, facility, or other premises.... Such an inspection may only be made upon the presentation of appropriate credentials and of a written notice to the owner, operator, or agent in charge of the premises or conveyance to be inspected. A separate notice shall be given for each such inspection...

Each such inspection shall be commenced and completed with reasonable promptness and shall be conducted at reasonable times, within reasonable limits, and in a reasonable manner.

FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT

Section 9 - Inspection of Establishments

(a)..... "Before undertaking such inspection, the officers or employees must present to the owner, operator, or agent in charge of the establishment .. appropriate credentials and a written statement as to the reason for the inspection, including a statement as to whether a violation of the law is suspected. If no violation is suspected, an alternate and sufficient reason shall be given in writing..... If the officer or employee obtains any samples, prior to leaving the premises, he shall give to the owner, operator, or agent in charge a receipt describing the samples obtained and, if requested, a portion of each such sample equal in volume or weight to the portion retained.